

Yosina M. Lissebeck (SBN 201654)
Jacob R. Bothamley (SBN 319457)
DINSMORE & SHOHL LLP
655 West Broadway, Suite 800
San Diego, CA 92101
Tel: (619) 400-0500
Fax: (619) 400-0501
yosina.lissebeck@dinsmore.com
jacob.bothamley@dinsmore.com

Attorneys for Richard A. Marshack, Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

In re

KRISTINA LYNN SMITH,

Debtor.

Case No. 8:24-bk-12527-SC

Chapter 7

DECLARATION OF PHILIP MULJANA
AND SHU RONG CHANG ISO TRUSTEE'S
MOTION FOR: (1) ORDER
AUTHORIZING SALE OF REAL
PROPERTY LOCATED AT 27591 KATHY
COURT, LAGUNA NIGUEL, CALIFORNIA
92677: (A) OUTSIDE THE ORDINARY
COURSE OF BUSINESS; (B) FREE AND
CLEAR OF LIENS UNDER 363(F); (C)
SUBJECT TO OVERBIDS; AND (D) FOR
DETERMINATION OF GOOD FAITH
PURCHASER UNDER § 363(M)

Hearing Date:

Date: January 15, 2026

Time: 9:00 a.m.

Ctrm: 5C

Location: 411 West Fourth Street
Santa Ana, CA 92701

I, Philip Muljana; and I Shu Rong Chang (collectively "we"), declare as follows:

1. We are both of us over the age of 18 and competent to make this declaration.

2. Unless stated otherwise, all statements are from our personal knowledge and if called upon
to testify about any statement made in this declaration, we could and would willingly do so.

///

1 3. In November of 2025, we made an offer on the property commonly known as 27591 Kathy
2 Court, Laguna Niguel, California 92677 ("Property" or "Kathy Court Property") to Clarence
3 Yoshikane ("Agent"), real estate agent for the Richard A. Marshack ("Trustee"), Chapter 7 Trustee
4 for the bankruptcy estate of Kristina Lynn Smith ("Debtor"). The offer was in the amount of \$1.8
5 million.

6 4. We have no prior relationship with the Agent, Trustee, or the Debtor. All negotiations were
7 conducted at arm's length, and we have not received any preferential treatment by the Agent,
8 Trustee, or Debtor.

9 5. In making the offer, we were advised that the offer was subject to the overbidding process,
10 which was explained to us, and we gave our informed consent to that condition of sale.

11 6. We understand that Agent continues to market the Property and that we may ultimately be
12 outbid for this Property. We have not been promised any preferential treatment during the overbid
13 process, nor do we expect any.

14 We declare under penalty of perjury that the foregoing is true and correct. Executed on
15 December 23, 2025.

16
17 
PHILIP MULJANA

18
19 
SHU RONG CHANG

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 655 W. Broadway, Suite 800, San Diego, California 92101

A TRUE AND CORRECT COPY OF THE FOLLOWING DOCUMENTS:

DECLARATION OF PHILIP MALJANA AND SHU RONG SUPPORT OF TRUSTEE'S MOTION FOR: (1) ORDER AUTHORIZING SALE OF REAL PROPERTY LOCATED AT 27591 KATHY COURT, LAGUNA NIGUEL, CALIFORNIA 92677: (A) OUTSIDE THE ORDINARY COURSE OF BUSINESS; (B) FREE AND CLEAR OF LIENS UNDER 363(F); (C) SUBJECT TO OVERBIDS; AND (D) FOR DETERMINATION OF GOOD FAITH PURCHASER UNDER § 363(M)

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On December 24, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**:

On December 24, 2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

JUDGE'S COPY

The Honorable Scott C. Clarkson
United States Bankruptcy Court
Central District of California
Ronald Reagan Federal Building and Courthouse
411 West Fourth Street, Suite 5130 / Courtroom 5C
Santa Ana, CA 92701-4593

☒ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on December 24, 2025, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

December 24, 2025
Date

Bonnie Connolly
Printed Name

/s/ Bonnie Connolly
Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

David Coats on behalf of Creditor Wells Fargo Bank, N.A.
dacoats@raslg.com

Benjamin Heston on behalf of Creditor Jeffrey Adams Gomez
bhestonecf@gmail.com, benheston@recap.email, NexusBankruptcy@jubileebk.net

Richard G. Heston on behalf of Creditor Richard G Heston
rheston@hestonlaw.com,
yflores@hestonlaw.com, docs@hestonlaw.com, HestonRR41032@notify.bestcase.com, hestonlaw@recap.email

Yosina M Lissebeck on behalf of Trustee Richard A Marshack (TR)
Yosina.Lissebeck@Dinsmore.com,
caron.burke@dinsmore.com; ayrton.celentino@dinsmore.com

Richard A Marshack (TR)
pkraus@marshackhays.com, ecf.alert+Marshack@titlexi.com

Jacob Newsum-Bothamley on behalf of Trustee Richard A Marshack (TR)
jacob.bothamley@dinsmore.com, bonnie.connolly@dinsmore.com

Matthew J Stockl on behalf of Trustee Richard A Marshack (TR)
mstockl@otterbourg.com, katrice.ortiz@dinsmore.com

United States Trustee (SA)
ustpreion16.sa.ecf@usdoj.gov

Julie J Villalobos on behalf of Debtor Kristina Lynn Smith
julie@oaktreelaw.com,
oakecfmail@gmail.com; villalobosjr51108@notify.bestcase.com; gus@oaktreelaw.com

Jennifer C Wong on behalf of Interested Party Courtesy NEF
bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

2. SERVED BY UNITED STATES MAIL:

State of California Franchise Tax Board
Attn: Officer, A Managing Or General Agent,
Or To Any Other Agent Authorized By Appointment
Or Law To Receive Service Of Process
PO Box 2952
Sacramento CA 95812-2952

R&S LAW GROUP, APC
400 W First St
Tustin, CA 92780

R&S LAW GROUP, APC
c/o: Tina M. Talbot, ESQ.
230 Newport Center Drive, Suite 210
Newport Beach, CA 92660-7525

Stegmeier, Gelbart, Schwartz and Benavente, LLP
Attn: Saul M. Gelbart, Esq.
19762 MacArthur Blvd, Suite 200
Irvine, CA 92612-2497

The Neshanian Law Firm
Attn: Eric Neshanian, Esq.
5 Corporate Park, Suite 250
Irvine, CA 92606-5169

A Center For Children and Family Law
Attn: Tracy Willis, Esq.
1111 W Chapman Ave
Orange, CA 92868-2828

Union Bank N.A.
Attn: Officer, A Managing Or General Agent,
Or To Any Other Agent Authorized By Appointment
Or Law To Receive Service Of Process
8248 Mercury Court, Suite B
San Diego, CA 92111

Union Bank N.A.
Residential Loan Department
Attn: Officer, A Managing Or General Agent,
Or To Any Other Agent Authorized By Appointment
Or Law To Receive Service Of Process
P.O. Box 85643
San Diego, CA 92186-5643

Quality Loan Service Corporation
Attn: Officer, A Managing Or General Agent,
Or To Any Other Agent Authorized By Appointment
Or Law To Receive Service Of Process
2763 Camino Del Rio South
San Diego, CA 92108

White Zuckerman Warsawsky Luna and Hunt, LLP
Attn: Drew Hunt
4 Park Plaza, Suite 200
Irvine, CA 92614-8533

White Zuckerman Warsawsky Luna and Hunt, LLP
c/o: Law Office of Howard Goodman
18321 Ventura Blvd, Suite 755
Tarzana, CA 91356-4250

Seabreeze Property Management
Attn: Officer, A Managing Or General Agent,
Or To Any Other Agent Authorized By Appointment
Or Law To Receive Service Of Process
PO Box 92799
Aliso Viejo, CA 92656

San Joaquin Hills Community Association
Attn: Officer, A Managing Or General Agent,
Or To Any Other Agent Authorized By Appointment
Or Law To Receive Service Of Process
27380 Aliso Niguel Road
Laguna Niguel, CA 92677

American Express National Bank N.A.
c/o: Lourdes R. Slinsky, Esq.
Modlin Slinsky, P.A.
1551 Sawgrass Corporate Parkway,
Suite 110, Sunrise, FL 33323

Jeffrey Adams Gomez
P.O. Box 1718
Upland, CA 91785

Kristina Lynn Smith
27591 Kathy Ct
Laguna Niguel, CA 92677-6025

State of California Franchise Tax Board
Bankruptcy Section MS A340
Attn: Officer, A Managing Or General Agent,
Or To Any Other Agent Authorized By Appointment
Or Law To Receive Service Of Process
PO Box 2952
Sacramento CA 95812-2952